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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 ELISEO NAPOLES, MARIE NAPOLES
13 AND M.N., A MINOR, BY AND
14 THROUGH HIS GUARDIAN AD LITEM,

15 Plaintiffs,

16 vs.

17 CLARK COUNTY SCHOOL DISTRICT,
18 DOES I through X, inclusive; ROE
19 CORPORATIONS I through X, inclusive

20 Defendant.

CASE NO: 2:19-cv-01474-APG-BNW

21 **STIPULATION AND ORDER TO**
22 **EXTEND DISCOVERY DEADLINES**
23 **(Second Request)**

24 COMES NOW, Plaintiffs, ELISEO NAPOLES, MARIE NAPOLES AND M.N., A
25 MINOR, BY AND THROUGH HIS GUARDIAN AD LITEM (hereinafter, "Plaintiffs"), by and
26 through their counsel, the law firm of Hatfield & Associates, Ltd., and Defendant CLARK
27 COUNTY SCHOOL DISTRICT (hereinafter "Defendant"), by and through its counsel, Phoebe
28 V. Redmond, Esq., and Crystal J. Herrera, Esq., of the Clark County School District Office of
the General Counsel, do hereby stipulate and agree to extend the discovery deadlines set forth in
the Stipulation and Order to Extend Discovery Deadlines First Request (ECF #15) sixty (60)
days pursuant to LR IA 6-1 and LR 26-4 for the reasons provided below. This is the parties'
second request for an extension of discovery deadlines.

1 Discovery closes on August 17, 2020. The last day to file Dispositive Motions is
2 September 16, 2020.

3 **1. DISCOVERY COMPLETED TO DATE:**

4 A. Plaintiffs served Initial Disclosures on Defendant on January 24, 2020.
5 Defendant served Initial Disclosures on Plaintiffs on January 27, 2020.

6 B. Plaintiffs provided Defendant with Medical Record Release Authorizations, and
7 Defendant correspondingly served subpoenas for M.N.'s medical records.

8 C. Plaintiff M.N. served discovery in the form of Interrogatories, Requests for
9 Documents, and Requests for Admissions on May 12, 2020.

10 D. Defendant served discovery in the form of Interrogatories and Requests for
11 Production of Documents, on June 5, 2020.

12 **2. DISCOVERY YET TO BE COMPLETED:**

13 A. Plaintiffs intends to take the depositions of fact and expert witnesses.

14 B. Defendant intends on receiving M.N.'s medical records which have yet to be
15 produced in response to its subpoenas and to take the depositions of fact and expert witnesses.

16 **3. REASONS DISCOVERY COULD NOT BE COMPLETED WITHIN THE**
17 **EXISTING DEADLINE.**

18 Good cause exists for this extension, as the current coronavirus/COVID-19 pandemic has
19 caused, and continues to cause, disruption to the practices of counsel involved in this case. The
20 parties have been diligent in conducting discovery. Indeed, in-person depositions could not
21 reasonably be scheduled or taken in the last 60 days and the parties agreed to defer written
22 discovery for a period of time due to the pandemic. Plaintiff's medical records are voluminous
23 and have to be updated. Defendant has requested medical records from over thirty medical
24 providers. In order to allow for the parties to complete the remaining discovery provided above,
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the parties respectfully request that the discovery deadlines in this matter be extended sixty (60) days. This is the second request for an extension, which is made in good faith and not for the purposes of delay.

4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY AND OTHER DISCOVERY DEADLINES.

A. On March 30, 2020, this Court ordered that the last date to complete discovery would be August 17, 2020, that the last day to file dispositive motions would be September 16, 2020, and that the last day to file a pretrial order would be October 16, 2020. The parties stipulate and agree to a proposed sixty (60) day stay of discovery plus the following proposed rescheduled discovery dates:

Summary of Proposed Changes

	Current Deadline	Revised Deadline
Close of Discovery	August 17, 2020	October 16, 2020
Interim Status Report	June 18, 2020	Not applicable (LR 26-3 deleted)
Disclosure of Experts and Expert Reports	June 18, 2020	August 17, 2020
Disclosure of Rebuttal Experts and their reports	July 17, 2020	September 16, 2020
Dispositive Motions	September 16, 2020	November 16, 2020
Pretrial Order	October 16, 2020	December 16, 2020 (If dispositive motions are filed, 30 days after the entry of the court's ruling on said motion)

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IT IS SO STIPULATED.

Dated: June 5, 2020

HATFIELD & ASSOCIATES, LTD.

/s/ Trevor J. Hatfield

By: _____

TREVOR J. HATFIELD

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Attorney for Plaintiff

Dated: June 5, 2020

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

/s/ Crystal J. Herrera

By: _____

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Attorneys for Clark County School District

IT IS SO ORDERED.

DATED this 8th day of June, 2020.


UNITED STATES MAGISTRATE JUDGE.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of June, 2020, I filed and served the foregoing
STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (Second Request)
with the Clerk of the Court using the ECF system which served the parties hereto electronically.

DATED: June 5, 2020

/s/ *Freda P. Brazier*
By: _____
An employee of Hatfield & Associates, Ltd.

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